



**SBAITI & COMPANY**

A TEXAS PROFESSIONAL LIMITED LIABILITY COMPANY

July 30, 2025

**Via E-File**

Honorable Jennifer L. Rochon  
United States District Judge  
U.S. District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *Hurlock v. Kelsier Ventures, et al*, Case No. 1:25-cv-03891**

Dear Judge Rochon:

We write on behalf of our client, Defendant Hayden Davis (“Davis”), and respectfully request an extension to answer Plaintiffs’ Amended Class Action Complaint, filed July 30, 2025, (the “Amended Complaint”) until 60 days after the filing of the Amended Complaint, to align the schedule with that set forth in ECF Nos. 9 and 10.

Good cause exists because the other appearing defendant has an answer deadline set for 60 days after the filing of the Amended Complaint (see ECF Nos. 9 and 10) such that a consolidated briefing schedule is in the interest of justice, conservation of the parties’ resources, and judicial efficiency.

Defendant Davis conferred with counsel for Plaintiff, and Plaintiff does not oppose the relief requested.

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Respectfully submitted on July 30, 2025.

/s/ George M. Padis

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cc: All Counsel via ECF